Remarks/Arguments

Claims 1-14 are pending in this application. Claims 1, 2, 4-8, and 10-13 have been amended. The Examiner has entered objections and rejections under 35 U.S.C. § 102(b). A discussion of these objections and rejections follows.

Objections to the Specification and Claims

In the Official Action, the Examiner directed Applicant to submit the proper PTO-1449 form to accompany the Information Disclosure Statement, filed August 28, 2002. A completed PTO-1449 form listing the art cited in that IDS is attached hereto. Accordingly, Applicant has now complied with the identification requirements of 37 CFR 1.98(b).

The Examiner objected to the arrangement of the Specification. In response, Applicant has amended the section headings to remove the bold face and underlining features. Accordingly, the Specification conforms to the guidelines provided in 37 CFR 1.77(b).

The Examiner further objected claims 2-10 and 13-14 because the preambles in claims 2, 4-8, 10, and 13 did not include the proper punctuation. Applicant has made the appropriate corrections. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the objections made in this application.

Claim Rejections Pursuant to 35 U.S.C. §102(b)

The Examiner rejected claims 1-14, under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,151,608 (Abrams). Applicant respectfully traverses this rejection in view of the amendments made herein. The Examiner offers these comments:

> *Abrams teaches a computer system for migrating a source database to a target database (see abstract and column 1, lines 5-7) comprising: . . . a generically coded database conversion engine wherein the database conversion engine is coded to perform conversions independent of the specific source database and target database associated with a conversion (see column 1, lines 39-45 and column 5, lines 42-26).*

In response to these comments, Applicant has amended claims 1 and 11-12 to indicate that the claimed invention comprises a generically coded database conversion engine that is coded to perform conversions independent of the specific type of source database and the specific type of target database associated with a conversion. Consequently, the database conversion engine can handle translations for any combination of source and target databases, including homogenous conversions, heterogenous conversions, distributed conversions, relational to object-oriented conversions, object-oriented to relational conversions, relational to relational conversions, object-oriented to object-oriented conversions, and more.

Abrams only describes a system for migrating data from one or more ACSII files or relational databases to one or more relational database tables using migration rules and patterns to translate and transform the data. Abrams does not describe a database conversion engine coded to be database non-specific such that it may convert data from any type of source database to any type of target database.

For instance, in the Abstract, Abrams clearly states that the "[m]ethod and system of the invention migrate data from one or more ASCII files and/or from one or more relational databases to one or more relational database tables[.]" (emphasis added). Further, at Col. 12, lines 6-20, Abrams explains that the approach to loading data into a temporary table depends

> *on whether the source data is in an ASCII file or whether it resides in another Oracle table. For a non-Oracle source, the invention provides a format for an ASCII file into which the user can extract data from a non-Oracle source and use SQL*Loader to insert the data into an Oracle temporary table. . . . the user only needs to create an extract table and dump it into the temporary Oracle table.*

Thus, the source database must be an ASCII file or an Oracle table. Abrams does not disclose a conversion engine capable of handling translations for any combination of source and target feeds.

Applicant has amended the claims to clarify that the database conversion engine of the present invention is generically coded to handle input for any type of source databse and produce output for any type of target database. Specifically, Applicant has added the following amendment to Claim 1, which is representative of this change (independent claims 11 and 12 contain similar language):

> 1. (Amended) A computer system for migrating a source database to a target database comprising:
> - a set of mapping instructions;
> - a target schema specification; and
> - a generically coded database conversion engine wherein said database conversion engine is coded to perform conversions independent of the specific type of source database and the specific type of target database associated with a conversion;
>
> wherein:
> - data in said source database is sent to said database conversion engine;
> - said target schema specification defines said target database;

- said set of mapping instructions defines at least one translation instruction for the translation of said source data from the source database to the target database;
- said database conversion engine receives said source data, said set of mapping instructions and said target schema specification;
- said database conversion engine parses said set of mapping instructions and said target schema specification;
- said database conversion engine performs said set of mapping instructions on said source data; and
- said database conversion engine uploads a resulting set of data into said target database in accordance with said target schema specification.

These amendments are intended to point out that the present invention differs from the prior art because the data base conversion engine can process conversions for any combination of source and target databases.

Antecedent basis for these amendments may be found in the Summary of the Invention, Page 4, paragraph [010]: *The database conversion engine may be configured/coded to handle input for any type of source database (possibly via the source extract format specification) and produce output for any type of target database (via the mapping specification and target schema specification). Therefore the database conversion engine can handle translations for any combination of source and target feeds including homogenous conversions, heterogenous conversions, distributed conversions, relational to object-oriented conversions, object-oriented to relational conversions, relational to relational conversions, object-oriented to object-oriented conversions, and more. The database conversion engine is coded to be database non-specific so that the only database specific items necessary for a particular conversion are the mapping specification, target schema specification, and possibly the source extract format specification. See also* Detailed Description of the Invention, Page 21, paragraph [049]; Detailed Description of the Invention, Page 29, paragraph [077].

Abrams clearly does not teach or suggest a system for migrating a source database to a target database comprising generically coded database conversion engine wherein the database conversion engine is coded to perform conversions independent of the specific type of source database and the specific type of target database. To the contrary, Abrams only teaches a system for migrating data from one or more ASCII files and/or relational databases to one or more relational database tables. (See, Abrams, Col. 6, lines 19-27 and Col. 12, lines 6-19).

Applicant is confident that the above arguments and amendments sufficiently distinguish the prior art from the rejected claims by pointing out that the database conversion engine is generically coded to handle translations from any combination of source and target databases. As such, the migration system employed in Abrams does not anticipate the database non-specific functionality of the present invention.

These amendments and the above arguments also apply to the rejected claims that depend from claims 1, 11, and 12. With regard to claims 1-14, Applicant respectfully requests withdrawal of this rejection on the basis of arguments presented above and the amendments outlined in this response.

Conclusion

In light of the arguments and amendments made to the claims herein, it is respectfully submitted that the claims of the present application meet the requirements of patentability under 35 U.S.C. § 102(b). Accordingly, reconsideration and allowance of these claims are earnestly solicited. Applicant's undersigned attorney has made a good faith effort to revise

the claims so as to meet the patentability concerns raised by the Examiner in the Office Action. If the Examiner feels that any additional modifications are necessary prior to the issuance of a notice of allowance, he is invited to call the Examiner's undersigned attorney at the phone number given below so that those specific issues can be worked out.

Respectfully submitted,

NANDAGOPAL MYSORE JAYARAM ET AL.

By: _____

Ria Farrell Schalnat
USPTO Registration No. 47,058
Attorney for Applicants
FROST BROWN TODD LLC
2200 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6167

CERTIFCATE OF MAILING

I hereby certify that a copy of this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22303-1450 this 17 day of September, 2004.

Sarah Abraham

Sarah Abraham